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January 5, 2015

**VIA ECF**

Hon. Alison J. Nathan  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

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**Re: Mark, et al. v. Gawker Media LLC, et al., No. 13 Civ. 04347 (AJN) (SN)**

Dear Judge Nathan:

This firm is counsel to the defendants in the above-captioned matter, Gawker Media LLC and Nick Denton (collectively, "Gawker"), and I write in response to Plaintiffs' letter of December 15, 2014, concerning Plaintiffs' discovery requests related to Gawker's gross revenues and tax returns.

Plaintiffs first proposed that Gawker stipulate to revenues of at least \$500,000 on the evening of December 15, and Gawker responded overnight that it would so stipulate.

Gawker also is willing to agree to produce such W-9 and 1099 forms as it is able to locate that contain the names of former interns and that relate to the periods of their internships.

We understand that these agreements will satisfy the Plaintiffs' requests, and therefore that there is no dispute on these matters that requires action by the Court.

Respectfully submitted,

/s/Mark W. Batten

Mark W. Batten

cc: Andrea Paparella, Esq.  
Robert Adler, Esq.